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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91202841
Party	Plaintiff The Cincinnati Reds LLC
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Submission	Other Motions/Papers
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Date	12/07/2011
Attachments	MS. RED Motion on Consent to Suspend.pdf (3 pages)(23585 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/151,260
Filed: October 13, 2010
For Mark: MS. RED
Published in the Official Gazette: June 7, 2011

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THE CINCINNATI REDS LLC,

Opposer,

v.

DANIELLE BIMONTE,

Applicant.

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Opposition No. 91202841

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of three (3) months, until **March 7, 2012**. Applicant's counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the

proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
December 7, 2011

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Maya L. Tarr/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 7, 2011, I caused a true and correct copy of the foregoing Motion on Consent to Suspend Proceedings and to Extend Discovery Period if Opposition is Resumed to be sent via First Class Mail, postage prepaid, to Applicant's counsel and correspondent of record, Wallace Collins, 250 E. 39th Street, Apt. 9K, New York, NY 10016-0073.

/Maya L. Tarr/
Maya L. Tarr